

BEFORE THE POSTAL REGULATORY COMMISSION
WASHINGTON, D.C.

RANDALL EHRLICH,

Complainant.

Docket No.: C2020-1

MOTION FOR EXTENSION OF TIME
OF APPROXIMATELY NINETY
MINUTES

Complainant **RANDALL EHRLICH**, through attorney **ADAM P. KARP** of **ANIMAL LAW OFFICES**, attorney for **RANDALL EHRLICH**, requests a ninety-minute extension of time for response to USPS's motion to dismiss.

At approximately 3:04 p.m. PDT on January 30, 2020, Mr. Ehrlich filed his response to USPS's motion to dismiss with supporting *Second Ehrlich Declaration* and *Exhibit 1* thereto. Upon filing, Mr. Karp received a notice that it would be logged with the PRC at 8 a.m. on January 31, 2020.

Mr. Karp assumed that, as with all federal courts, the filing day ends at 11:59 p.m. in the court where the action is pending. Accordingly, he assumed he had until 8:59 p.m. PDT to file same. It appears, however, that the PRC ends the filing day at 4:30 p.m. EDT, or 1:30 p.m. PDT. It is the Pacific Time Zone where Mr. Karp resides and where this action has arisen. Given that the incident, the complainant, and the post office and carrier at issue are all in the Pacific Time Zone, Mr. Ehrlich hereby seeks leave to accept his pleadings approximately ninety minutes after the time that the PRC closed (i.e., 6:04 p.m. EDT). No prejudice will face USPS. Justice would

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1 not be done by disallowing this modest request, particularly one made in good faith and based on
2 a reasonable expectation that accommodation would be made for the three-hour time difference.

3 39 CFR 3001.16 provides that an extension of time to respond to a motion may be allowed
4 by the Commission. Mr. Ehrlich hereby asks that he his oppositional pleadings be deemed timely
5 filed.

6 Respectfully submitted this January 30, 2020.

7 ANIMAL LAW OFFICES

8 */s/ Adam P. Karp*

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10 Adam P. Karp, WSB No. 28622
11 Attorney for Complainant Ehrlich
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